

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KALIE MUTTER,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION FILE
)	NO. 1:19-CV-02623-LMM
HERITAGE MANAGEMENT GROUP)	
INC., INDIAN RIVER TRANSPORT, CO.,)	
and DAVID HILL,)	
)	
Defendants.)	

PLAINTIFF’S FIRST SUPPLEMENTAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.1 (N.D. Ga.), Plaintiff supplements her Initial Disclosures as follows:

Initial Disclosure No. 3: Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

Supplemental Response to Disclosure No. 3: See Plaintiff’s supplemental witness list attached as Attachment A.

Initial Disclosure No. 4: Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Initial Disclosures as Attachment B.)

Supplemental Response to Disclosure No. 4: See Plaintiff's expert witness list attached as Attachment B.

Initial Disclosure No. 6: In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

Supplemental Response to Disclosure No. 6: In supplement to the previous itemization of Plaintiff's past medical bills, please refer to the updated itemization below of Plaintiff's medical bills collected to date.

<u>PROVIDER</u>	<u>CHARGES</u>
Gwinnett County EMS	\$1,050.00
Gwinnett Medical Center	\$12,569.00
Gwinnett Emergency Specialists	\$978.00
North Metro Radiology Associates	\$399.00
South Atlanta Neurosurgery	\$51,519.08
American Health Imaging	\$9,045.00
Northeast Georgia Physicians	\$300.00
Minimally Invasive Neurospine	\$148,000.00
Allspine Anesthesia	\$8,500.00
Piedmont	\$456.00

TOTAL: \$232,816.08

Respectfully submitted, this 20th day of November, 2019.

SHIVER HAMILTON, LLC

By: /s/ R. Scott Campbell
R. Scott Campbell, Esq.
Georgia Bar No. 142384
Attorney for Plaintiff

3490 Piedmont Road, Suite 640
Atlanta, Georgia 30305
(404) 593-0020
(888) 501-9536 [Facsimile]
scott@shiverhamilton.com

THE GUMPRECHT LAW FIRM

/s/ Michael E. Gumprecht

Michael E. Gumprecht
Georgia Bar No. 903081

Attorney for Plaintiff

125 Townpark Drive #300
Kennesaw, Georgia 30144
(678) 800-1050
michael@galawfirm.com

PLAINTIFF'S ATTACHMENT A – WITNESS LIST

(A) The name and, if known, the address and telephone number of each individual likely to have information discoverable under rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information;

In supplement to the previously identified witnesses, Plaintiff identifies the following friends and co-workers who have information relating to how Plaintiff has been impacted by the injuries suffered in the subject wreck.

1. Daniel Ward;
2. Kimberly Ward;
3. Arick Biltz; and
4. Rafael Cruz.

PLAINTIFF'S ATTACHMENT B – EXPERT LIST

(B) The name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed. R. Civ. P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule.

In supplement to the previously identified witnesses Plaintiff identifies the following non-retained expert as a witness she may call to testify at the trial of this case:

Shahram Rezaiaimiri, M.D. Dr. Rezaiaimiri has treated Plaintiff for injuries she sustained as a result of the collision at issue, including but not limited to, injuries to her back and associated symptoms. Dr. Rezaiaimiri is expected to provide expert testimony, consistent with the medical records, regarding Plaintiff's wreck related injuries, including but not limited to, the cause, effects and prognosis of her injuries, and the past and future medical treatment and associated charges. Dr. Rezaiaimiri is expected to provide such testimony based on his education, training and experience as a medical doctor and his personal treatment of Plaintiff. Dr. Rezaiaimiri has not yet been deposed; however, Plaintiff anticipates offering his testimony at trial by video deposition.

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2019, I electronically filed the foregoing *Plaintiff's First Supplemental Disclosures* with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

David A. Dial, Esq.
Shawn D. Scott, Esq.
Jason T. Vuchinich, Esq.
Weinberg, Wheeler, Hudgins,
Gunn & Dial, LLC
3344 Peachtree Road, Suite 2400
Atlanta, Georgia 30326

SHIVER HAMILTON, LLC

By: /s/ R. Scott Campbell
R. Scott Campbell, Esq.
Georgia Bar No. 142384
Attorney for Plaintiff

3490 Piedmont Road, Suite 640
Atlanta, Georgia 30305
(404) 593-0020
(888) 501-9536 [Facsimile]
scott@shiverhamilton.com